

### ***Remarks***

Reconsideration of this Application is respectfully requested. Upon entry of the foregoing amendment claims 61-120 are pending in the application, of which claims 61, 81, 98, 108, and 116 are independent. No new matter has been introduced by way of the foregoing amendment.

#### ***The Claims Are Patentable Over the Crabtree and the Janky References***

Claims 1-60 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,185,134 to Crabtree et al (“the Crabtree reference”). Claims 1-60 have been canceled. Accordingly, the rejection of claims 1-60 under 35 U.S.C. § 102(b) based on the Crabtree reference has been rendered moot.

Claims 1-9, 12-42 and 47-60 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,067,031 to Janky et al (“the Janky reference”). Claims 10-11 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Janky. Claims 1-42 and 47-60 have been canceled. Accordingly, the rejections under 35 U.S.C. § 102(b) and 35 U.S.C. § 103(a) based on the Janky reference have been rendered moot.

Independent claim 61 recites, “associating the track of the object with at least one of a seed zone or a queue set based on the position value, the seed zone being defined by a second area from which a queue originates, the seed zone being associated with a seed location, the queue set being used to define the queue.” Accordingly, the Applicant respectfully submits that independent claim 61 is allowable over the Crabtree and the Janky references, and any combination thereof. Additionally, claims 62-80, which depend from claim 61 are allowable over the Crabtree and Janky references, and any combination thereof, at least because of their dependency from claim 61.

Independent claim 81 recites, “a processor system configured to associate the track of the object with at least one of a seed zone or a queue set based on the position value, the seed zone being defined by an area from which a queue originates, the seed zone being associated with a seed location, the queue set being used to define the queue.” Accordingly, the Applicant respectfully submits that independent claim 81 is allowable over the Crabtree and the Janky references and any combination thereof.

Additionally, claims 82-97, which depend from claim 82 are allowable over the Crabtree and Janky references, and any combination thereof, at least because of their dependency from claim 82.

Independent claim 98 recites, “associating with a seed zone a track of a first object when the first object is located within the seed zone, the seed zone being associated with a seed location, the track of the first object being included in a queue set when a seed parameter condition is satisfied based on the track of the first object, the queue set being used to define a queue associated with the seed location.” Accordingly, the Applicant respectfully submits that independent claim 98 is allowable over the Crabtree and the Janky references and any combination thereof. Additionally, claims 99-107, which depend from claim 98 are allowable over the Crabtree and Janky references, and any combination thereof, at least because of their dependency from claim 98.

Independent claim 98 recites, “including a track of a third object in the queue set when a queue parameter condition is satisfied based on a calculated value, the calculated value being based on a third position value associated with the track of the third object and at least one of the first position value or the second position value.” Accordingly, the Applicant respectfully submits that independent claim 108 is allowable over the Crabtree and the Janky references and any combination thereof. Additionally, claims 109-115, which depend from claim 108 are allowable over the Crabtree and Janky references, and any combination thereof, at least because of their dependency from claim 108.

Independent claim 116 recites, “determining whether the track of the object is included in a seed zone, the seed zone being defined by a second area from which a queue originates, the seed zone being associated with a seed location.” Accordingly, the Applicant respectfully submits that independent claim 116 is allowable over the Crabtree and the Janky references and any combination thereof. Additionally, claims 117-120, which depend from claim 116 are allowable over the Crabtree and Janky references, and any combination thereof, at least because of their dependency from claim 116.

### *Conclusion*

All of the stated grounds of rejection have been rendered moot. The Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding rejections and that such rejections be withdrawn. The Applicant believes that a full and complete response has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that further personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

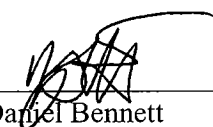
The Director is hereby authorized to charge any appropriate fees under 37 C.F.R. §§ 1.16, 1.17, and 1.21 that may be required by this paper, and to credit any overpayment, to Deposit Account No. 50-1283.

Dated: July 26, 2006

COOLEY GODWARD LLP  
ATTN: Patent Group  
The Bowen Building  
875 15<sup>th</sup> Street, NW Suite 800  
Washington, DC 20005-2221  
Tel: (703) 456-8000  
Fax: (202) 842-7899

Respectfully submitted,  
COOLEY GODWARD LLP

By:

  
Daniel Bennett  
Reg. No. 54,993